

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No.: 4:13CR443 SNLJ
v.)	
)	
ALAN R. JUNG,)	
)	
Defendant.)	

MOTION FOR BOND REDUCTION

COMES NOW Defendant, Alan R. Jung (“Defendant”), by and through counsel, pursuant to Federal Rule of Criminal Procedure 46(a), and for his Motion for Bond Reduction, states to the Court as follows:

1. Defendant is 41 years of age and a lifelong resident of the St. Louis, Missouri area.
2. Defendant was charged under 18 U.S.C. §§ 115 and 1114 for an alleged verbal threat made to a female postal worker that occurred on or about October 3, 2014.
3. That said charges are excessive in that they rely solely on one person’s interpretation of words said at a public restaurant during lunch hour.
4. That the Defendant was fully cooperative with police on the morning he was unexpectedly approached and arrested from his home in the early morning hours on October 4, 2013.
5. The current bond of No Bond is excessive.
6. The Defendant has a full support system in that he has two loving parents (Connie and Paul Jung), three brothers (Mike Jung, John Jung, and Dan Jung), four sisters (Jean Sander, Donna Puetz, Ellen Prewitt, and Sharon Russell), numerous nephews and nieces, and numerous

friends in the St. Louis area - all of whom are well respected, life-long residents of St. Louis, Missouri area with substantial ties to the community. Defendant maintains close and regular contact with all of his family members.

7. That as a result of his family's presence, support and involvement, Defendant is not a flight risk and has layers of support to ensure his appearance at all court settings in this matter.

8. That there is no evidence of any physical harm to anyone relating to this matter, that there is no history of such behavior, and that the Defendant is not a danger to his community.

9. That the weight of the evidence for the alleged crime against Defendant is not substantial.

9. That Defendant cooperated in his mental evaluation and would agree to any medical or mental health treatment being a special condition of his bond.

WHEREFORE, Defendant Alan R. Jung respectfully requests an Order from this Court issuing a bond in the amount of \$50,000.00 cash or professional surety.

Respectfully submitted,

RESTOVICHALLEN, LLC

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Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 17th day of April, 2014, a copy of the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Allison H. Behrens
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/s/ George B. Restovich